

**U.S. DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

SWEIGERT	CIVIL CASE #:
V.	1:18-CV-08653-VEC
GOODMAN	JUDGE VALERIE E. CAPRONI

**PLAINTIFF'S FOURTH NOTICE OF MOTION (WITH MEMORANDUM OF LAW
IN SUPPORT OF MOTION) FOR JUDICIAL NOTICE OF DOCUMENTS AND FACTS**

Pursuant to Federal Rule of Evidence 201, and in connection with Plaintiffs' Motion for Preliminary Injunctive Relief and discovery, Plaintiff respectfully requests that the Court take judicial notice of the following federal lawsuits that involve the Defendant as a party:

Civil Action No. 3:17-cv-00601, U.S.D.C. for E.D.Va., ROBERT DAVID STEELE & EARTH INTELLIGENCE NETWORK vs. JASON GOODMAN

- GENERAL AFFIDAVIT BY NON-PARTY, dated March 13, 2019, ECF no. 80

MEMORANDUM OF LAW

I. THE COURT MAY TAKE JUDICIAL NOTICE OF FACTS THAT ARE NOT SUBJECT TO REASONABLE DISPUTE WHERE THEIR ACCURACY CAN BE DETERMINED BY RELIABLE SOURCES

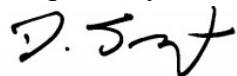
Pursuant to Rule 201(b)(2) of the Federal Rules of Evidence, courts may take judicial notice of facts that are not subject to reasonable dispute and are capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned. Where a Court is supplied with the necessary information, taking judicial notice is mandatory. See Fed. R. Evid. 201(d).

II. COURT RECORDS ARE SUBJECT TO JUDICIAL NOTICE

Pleadings and court filings are just the kind of documents that are not subject to reasonable dispute and are capable of accurate and ready determination under Rule 201(b)(2) of the Federal Rules of Evidence. Accordingly, it is proper for courts to take judicial notice of the existence of such documents. See *Roe v. Johnson*, 334 F. Supp. 2d 415, 419-20 (S.D.N.Y. 2004) (recognizing that a court, pursuant to Rule 201(b), may take notice of the public record, including complaints and court opinions).

Signed this eighth day of April (4/8), 2021.

Respectfully,



D. Geo. Sweigert

D. GEORGE SWEIGERT

GENERAL DELIVERY

NEVADA CITY, CA 95959-9998

SPOLIATION-NOTICE@MAILBOX.ORG

CERTIFICATE OF SERVICE

The undersigned hereby attests under penalties of perjury that copies of this communication have been sent via electronic mail message to the following parties on the eighth day of April (4/8) two thousand and twenty-one (2021).

Clerk of the Court, Room 200 U.S. District Court 500 Pearl Street New York, New York 10007-1312 EMAIL: temporary_pro_se_filing@nysd.uscourts.gov	Jason Goodman, CEO Multimedia System Design, Inc. 252 7th Avenue, Apart. #6S New York, NY 10001 truth@crowdsourcethetruth.org
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ATTACHMENT A FOLLOWS

**United States District Court
for the
Eastern District of Virginia (Richmond Division)**

Robert David Steele, et al., Plaintiff

Vs.

Case No.: 3:17-cv-00601-MHL

Jason Goodman, et al., Defendant

GENERAL AFFIDAVIT FROM NON-PARTY

**COMES NOW, _Dean Fougere (Titus Frost)_____, resident of _Plymouth_____, County of _____
_Plymouth_____, State of _Massachusetts_____ and who makes this his/her statement and
General Affidavit upon oath and affirmation of belief and personal knowledge that the following
matters, facts and things set forth are true and correct to the best of his/her knowledge:**

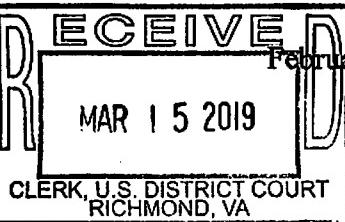
I Dean Fougere swear or affirm:

1. I am the content creator of the YouTube Channel, Steemit blog and twitter account in the pen name “Titus Frost”.
2. I am a completely independent content creator, I have no contracts, agreements or understandings with anyone. The only person with creative control over my work is me.
3. I am in no way a part of some conspiracy to do anything to anyone.
4. My interaction with Jason Goodman started after he and an associate of his “Quinn

Michaels” made a slanderous, completely erroneous hour long YouTube Video on

February 22, 2018 (<https://www.youtube.com/watch?v=fuLIV1EB078>) in which Jason

MAR 15 2019



and Quinn defamed multiple people including attacking everyone who supports the idea that is a social movement known as “Anonymous”. I decided after watching this video (2/22/18) that I would respond to their claims in a video. In the 2/22/18 video, Jason claims Anonymous is a “conspiracy” to get people to view Child Pornography on the “deep web”. Statements by Jason about yet another “conspiracy” which he has no evidence. Jason’s source in the 2/22/18 video is “Quinn Michaels”. Quinn Michaels, aka Korey Atkin is, in my opinion, at best unreliable, which is proven by Jason’s own comments in this video posted November 29th, 2018 (<https://youtu.be/m2ZMA7WZK-8>) where Jason is destroying the credibility of his former guest and research assistant (Korey Atkin).

5. At the beginning of this incident, I contacted Goodman by commenting and tweeting to his social media accounts (on Twitter, YouTube, etc.) my issues with this 2/22/18 video posted by Jason including the inaccuracies of Quinn Michaels. Goodman ignored the defamation in his video and never did a retraction. I waited two days before responding further.
6. After two days with no retraction, completely on my own, with no direction from anyone (despite Jason’s erroneous claims in court docket number 78), I created a response video merely criticizing Goodman’s inaccuracies. I am responding to false claims by Jason Goodman and showing him how his type of reporting is defamatory and slanderous of many people. Video I made on February 24, 2018 in response to (what is my opinion) Goodman’s slander and defamation: <https://youtu.be/iifdM8o3HNI>
7. In response to my video being published criticizing Jason Goodman, Jason then started a criminal harassment campaign against myself. Which is documented in a lawsuit D.

Sweigart vs Jason Goodman, In the United States District Court for the Southern District of New York (Foley Square), Case 1:18-cv-08653-UA, court document number 46, pages 6-8.

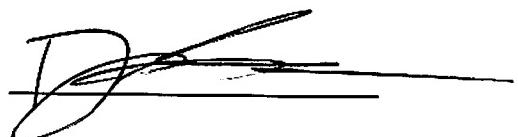
8. Jason Goodman decided to call me at my work place, during work hours, despite me posting multiple social media methods to contact me on every video. Jason and I discussed his claims about me in the unexpected phone call, during which I explained to Jason that I am not a racist anti-Semite (as accused by Jason).
9. Jason then hung up and called my boss, and threatened my boss with information that the FBI would be investigating me, and that Jason was going to press charges against me. Jason did this to get me fired in my opinion, which he admits in later videos about me on his channel. This is criminal harassment in my opinion, there was no need to contact my employer just because I made a video criticizing Jason Goodman. If my father was not my boss, I would be out of a job just because Jason Goodman wanted to harass me for questioning him.
10. I made a video on March 12, 2018 (<https://youtu.be/9VRGOG-LXqY>) responding to Jason's claims about me being a racist (I have two half African American children so I am not a racist at all). I criticized foreign influence over American Politicians and for this Jason has labeled me a racist anti-Semite. This is insulting to me and is far from the truth, and is a part of Jason's attempt to silence my criticism of him, in my opinion.
11. Jason Goodman has claimed and continues to claim in document number 78 of this lawsuit that I am working with other people to attack him. Which is unverifiable because it is factually inaccurate. I know of no such organization or group. I certainly know of no projects aimed at discrediting Jason Goodman.

12. I do not know Robert David Steele, I have had ZERO communication with him. I am not familiar with any schemes or plots to work with operative of Robert David Steele.
13. I vaguely know Manuel Chavez III "Defango". Like my previous statement, I deny that Manual "Defango" and I are working together, nor do we even get along as evidenced in this recorded call that took place Nov 5, 2017 long before this Goodman situation:
[\(https://youtu.be/Hay9W9B-Iuc\)](https://youtu.be/Hay9W9B-Iuc)
14. George Webb stated in this video at the 7 minute mark: <https://youtu.be/0p25z-KMXmg> he was hired by Mossad (Israel Intelligence Agency), and Jason was working with him in their own words.
15. There is no conspiracy that I am aware of involving Jason Goodman. I do not know of any organization that is plotting against Jason. I do not know of any goals or plans to discredit Jason.

Further affiant saith not.

I SWEAR OR AFFIRM THAT THE ABOVE AND FOREGOING
REPRESENTATIONS ARE TRUE AND CORRECT TO THE BEST OF MY
INFORMATION, KNOWLEDGE, AND BELIEF.

WITNESS my signature, this the 13th day of March, 2019.



Signature of Affiant

I hereby certify (under the penalties of perjury) that the foregoing pleading has been deposited with the U.S. Post Office with First Class mail to the following parties:

Copies forwarded to the following:

CLERK OF COURT
United States District Court
Eastern District of Virginia
701 E Broad St.
Richmond, VA 23219

Steven Scott Biss, esq.
300 West Main St
Ste 102
Charlottesville, VA 22903

Jason Goodman
252 7th Avenue
New York, NY 10001

Richard Johan Conrod , Jr.
Kaufman & Canoles PC
150 W Main St
PO Box 3037
Norfolk, VA 23510

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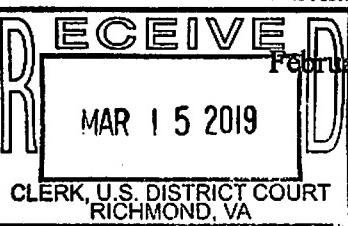
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